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December 9, 2024

Via CM/ECF

Hon. James B. Clark, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

**Re: Y.Y. v. Mayer-Regalbuto, et al.
Docket No. 24-cv-08401**

**Request for Extension of Time to Respond to Complaint
and Request to Hold in Abeyance Plaintiff's Motion for
Substituted Service (ECF No. 17)**

Dear Judge Clark:

I represent Defendants Veronica Zeron and Susan Lennon, employees of the New Jersey Department of Children & Families, in the above referenced matter. I write to request a sixty-day extension of time, to **February 7, 2025**, to respond to the Complaint on behalf of Ms. Zeron and Ms. Lennon. I have contacted Plaintiff's attorney, Lawrence Katz, Esq., for consent, but have not yet received a response.

Ms. Zeron was served and requested representation by my office. Mr. Katz graciously consented to my office's request to extend Ms. Zeron's time to answer for thirty days, to December 9, 2024, while we processed Ms. Zeron's request. My office forwarded a revised Stipulation to Mr. Katz for filing with the Court, but we have not received it back yet. (Mr. Katz previously signed a Stipulation, but we did not file it as it contained a typographical



The Hon. James B. Clark, U.S.M.J.

December 9, 2024

Page 2

error).

Meanwhile, Ms. Lennon was made aware of the lawsuit, requested representation from my office and agreed to waive service. The representation requests by both Ms. Zeron and Ms. Lennon were granted. Accordingly, my office contacted Mr. Katz to request an additional sixty days, to February 7, 2025, to respond to the Complaint on behalf of both Ms. Zeron and Ms. Lennon.

A third defendant, Ms. Kimberly Roberts, has retired since the events in 2016 that give rise to this case, and is no longer employed by the Department of Children & Families. My office is in the process of contacting Ms. Roberts to determine whether she will request representation and agree to waive service.

I am aware that Mr. Katz has filed a motion to permit substituted service on Ms. Zeron, Ms. Lennon and Ms. Roberts (ECF No. 17), however, that motion is moot as to Ms. Zeron and Ms. Lennon. As to Ms. Roberts, we would ask the Court to please hold the motion in abeyance while we attempt to contact Ms. Roberts to resolve the service issue.

We thank the Court for its courtesy and consideration in this matter.

Respectfully,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Natalie K. Dennis
Natalie K. Dennis
Deputy Attorney General

cc: via CM/ECF
Lawrence Katz, Esq.